

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff, 12 Civ. 6421 (KMK)

v.

**EDWARD BRONSON, E-LIONHEART
ASSOCIATES, LLC, d/b/a FAIRHILLS CAPITAL**

Defendants

and

FAIRHILLS CAPITAL, INC.

Relief Defendant.

**DECLARATION OF MAUREEN PEYTON KING IN SUPPORT OF
PLAINTIFF'S MOTION FOR A TEMPORARY RESTRAINING ORDER
AND ASSET FREEZE TO PREVENT THE BRONSONS' DISSIPATION
OR LIQUIDATION OF ASSETS WITHOUT OVERSIGHT**

I, Maureen Peyton King, pursuant to 28 U.S.C. § 1746, do hereby declare as follows:

1. I am a senior trial counsel employed by the Securities and Exchange Commission (the "Commission") in its New York Regional Office. I am a member of the bar of this Court. I am personally familiar with the facts set forth herein.

2. I make this declaration in support of the Commission's application for a temporary restraining order and asset freeze to prevent the Bronson's dissipation or liquidation of their assets without oversight.

3. Bronson still owes the SEC around \$10 million in disgorgement based on its Judgment in this case.

4. Neither Bronson nor his wife have accounted for at least \$340,000 of the \$2 million withdrawn from Top Knot in cash or transferred to other accounts between mid-February

and September 2022. *See* King Decl. Exs. 4-7 below.

5. Accompanying this declaration is a series of exhibits. The following table lists the exhibits, each of which is a true and correct copy of the document described, with redactions as required and for sensitive information (if any).

Exhibit #	Description
1	December 28, 2022 emails between Mr. Burstein and SEC counsel.
2	Excerpt from Nov. 22, 2021 contempt hearing.
3	Excerpt of Dec. 12, 2022 hearing tr.
4	Dec.12, 2022 hearing ex. 99 reflecting \$157,537.48 in withdrawals.
5	Dec.12, 2022 hearing ex. 90 reflecting \$108,550 in wires to Dawn Bronson.
6	Dec.12, 2022 hearing ex. 91 reflecting \$62,900 in wires to Dawn Bronson's Webster bank account.
7	Dec. 12, 2022 hearing ex. 109 reflecting \$13,500 in transfers to V2IP, Inc.

I declare under penalty of perjury that the foregoing is true and correct. Executed at New York, New York, on December 30, 2022.

s/Maureen Peyton King
Maureen Peyton King